

## STATE OF SOUTH CAROLINA

189177

## (Caption of Case)

Petition of the South Carolina Department of  
Transportation for Implementation of 511 Service  
for Travel Information

BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA

## COVER SHEET

## DOCKET

NUMBER: 2007 - 328 - C

(Please type or print)

Submitted by: Scott Elliott

SC Bar Number: \_\_\_\_\_

Address: 721 Olive StreetTelephone: 803-771-0555Columbia SC 29205Fax: 803-771-8010

Other: \_\_\_\_\_

Email: sellriott@elliottlaw.us

NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

**DOCKETING INFORMATION** (Check all that apply)

☐ Emergency Relief demanded in petition ☐ Request for item to be placed on Commission's Agenda expeditiously

☐ Other: \_\_\_\_\_

INDUSTRY (Check one)	NATURE OF ACTION (Check all that apply)		
<input type="checkbox"/> Electric	<input type="checkbox"/> Affidavit	<input type="checkbox"/> Letter	<input type="checkbox"/> Request
<input type="checkbox"/> Electric/Gas	<input type="checkbox"/> Agreement	<input type="checkbox"/> Memorandum	<input type="checkbox"/> Request for Certification
<input type="checkbox"/> Electric/Telecommunications	<input type="checkbox"/> Answer	<input type="checkbox"/> Motion	<input type="checkbox"/> Request for Investigation
<input type="checkbox"/> Electric/Water	<input type="checkbox"/> Appellate Review	<input type="checkbox"/> Objection	<input type="checkbox"/> Resale Agreement
<input type="checkbox"/> Electric/Water/Telecom.	<input type="checkbox"/> Application	<input type="checkbox"/> Petition	<input type="checkbox"/> Resale Amendment
<input type="checkbox"/> Electric/Water/Sewer	<input type="checkbox"/> Brief	<input type="checkbox"/> Petition for Reconsideration	<input type="checkbox"/> Reservation Letter
<input type="checkbox"/> Gas	<input type="checkbox"/> Certificate	<input type="checkbox"/> Petition for Rulemaking	<input type="checkbox"/> Response
<input type="checkbox"/> Railroad	<input type="checkbox"/> Comments	<input type="checkbox"/> Petition for Rule to Show Cause	<input type="checkbox"/> Response to Discovery
<input type="checkbox"/> Sewer	<input type="checkbox"/> Complaint	<input checked="" type="checkbox"/> Petition to Intervene	<input type="checkbox"/> Return to Petition
<input type="checkbox"/> Telecommunications	<input type="checkbox"/> Consent Order	<input type="checkbox"/> Petition to Intervene Out of Time	<input type="checkbox"/> Stipulation
<input checked="" type="checkbox"/> Transportation	<input type="checkbox"/> Discovery	<input type="checkbox"/> Prefiled Testimony	<input type="checkbox"/> Subpoena
<input type="checkbox"/> Water	<input type="checkbox"/> Exhibit	<input type="checkbox"/> Promotion	<input type="checkbox"/> Tariff
<input type="checkbox"/> Water/Sewer	<input type="checkbox"/> Expedited Consideration	<input type="checkbox"/> Proposed Order	<input type="checkbox"/> Other:
<input type="checkbox"/> Administrative Matter	<input type="checkbox"/> Interconnection Agreement	<input type="checkbox"/> Protest	
<input type="checkbox"/> Other:	<input type="checkbox"/> Interconnection Amendment	<input type="checkbox"/> Publisher's Affidavit	
	<input type="checkbox"/> Late-Filed Exhibit	<input type="checkbox"/> Report	

ORIGINAL

ELLIOTT & ELLIOTT, P.A.  
ATTORNEYS AT LAW  
721 OLIVE STREET  
COLUMBIA, SOUTH CAROLINA 29205  
[selliott@elliottlaw.us](mailto:selliott@elliottlaw.us)

SCOTT ELLIOTT

TELEPHONE (803) 771-0555  
FACSIMILE (803) 771-8010

October 30, 2007

VIA HAND DELIVERY

Mr. Charles L.A. Terreni  
Chief Clerk of the Commission  
SC Public Service Commission  
P. O. Drawer 11649  
Columbia, SC 29211

RECEIVED  
2007 OCT 30 PM 1:24  
SC PUBLIC SERVICE  
COMMISSION

RE: Petition of the South Carolina Department of Transportation for  
Implementation of 511 Service for Travel Information  
Docket No. 2007-328-C

Dear Mr. Terreni:

Enclosed for filing are an original and ten (10) copies of the Petition to Intervene of United Telephone Company of the Carolinas d/b/a Embarq. By copy of this letter, I am serving all parties of record with a copy of this Petition as indicated on the attached Certificate of Service.

I have enclosed an extra copy of this petition which I would ask you to date stamp and return to me via my courier. If you have questions, please do not hesitate to contact me.

Sincerely,

Elliott & Elliott, P.A.

  
Scott Elliott

SE/jcl

Enclosure

cc: All Parties of Record  
Susan S. Masterton, Esq.

OK D. Duke  
OK D. Duke  
PETITION DATED  
SERVICE: OK D. Duke

**BEFORE THE  
PUBLIC SERVICE COMMISSION**

**OF SOUTH CAROLINA**

**Docket No. 2007-328-C**

Petition of the South Carolina )  
Department of Transportation )  
for Implementation of 511 Service )  
for Travel Information )

**PETITION TO INTERVENE  
OF UNITED TELEPHONE COMPANY  
OF THE CAROLINAS d/b/a EMBARQ**

In accordance with S.C. Code Regs. 103-825, United Telephone Company of the Carolinas d/b/a Embarq (hereinafter "Embarq") respectfully petitions the Public Service Commission of South Carolina ("the Commission") for permission to intervene as a formal party of record in the above-captioned proceeding. In support of this Petition, Embarq shows as follows:

1. Embarq is a telephone utility presently providing certain telecommunications services to its subscribers under intrastate tariffs approved by the Commission.
2. Embarq's authorized representatives in this proceeding are:

Scott Elliott  
Elliott & Elliott, P.A.  
721 Olive Street  
Columbia, SC 29205  
803-771-0555  
803-771-8010  
[selliott@elliottlaw.us](mailto:selliott@elliottlaw.us)

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SC PUBLIC SERVICE  
COMMISSION

Susan S. Masterton  
Embarq  
1313 Blair Stone Road  
Tallahassee, FL 32301  
(850) 599-1560 (voice)  
(850) 878-0777 (fax)  
[susan.masterton@embarq.com](mailto:susan.masterton@embarq.com)

3. The Commission opened this docket to address a request by the South Carolina Department of Transportation ("DOT") to designate a 511 abbreviated dialing code for transportation information.

4. As a local telecommunications provider in South Carolina, the Commission's decision in this docket will directly affect Embarq. Embarq has a direct and substantial interest in this docket and respectfully requests to intervene with full rights to participate as a party of record.

5. Embarq's positions in this docket will be more fully detailed during the course of the proceeding.


6. Embarq is informed and believes that its request to be made a party to this docket is in the public interest, comports with the policies of the Commission for public participation in matters before it and will assist the Commission in developing a full and complete record.

WHEREFORE, based on the foregoing, Embarq requests the following relief:

1. that it be allowed to intervene as a formal party of record in this proceeding by this Commission's granting its Petition to Intervene;

2. that any parties of record be directed to provide Embarq with a copy of any pleadings, testimony and exhibits or any other filings made in this proceeding; and
3. that the Commission grant such other relief as it deems just and proper.

P.3  
Respectfully submitted on this 30<sup>th</sup> day of October, 2007



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Scott Elliott, Esquire  
Elliott & Elliott, P.A.  
721 Olive Street  
Columbia, SC 29205  
803-771-0555 (P)  
803-771-8010 (F)  
[selliott@elliottlaw.us](mailto:selliott@elliottlaw.us)

Susan S. Masterton, Esquire  
Embarq  
1313 Blair Stone Road  
Tallahassee, FL 32301  
850-599-1560 (P)  
850-878-0777 (F)  
[susan.masterton@embarq.com](mailto:susan.masterton@embarq.com)

Attorneys for United Telephone Company  
of The Carolinas d/b/a Embarq

Columbia, South Carolina  
October 30, 2007

ORIGINAL

BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA

Docket No. 2007-328-C

Petition of the South Carolina )  
Department of Transportation )  
for Implementation of 511 Service )  
for Travel Information )  
\_\_\_\_\_ )

CERTIFICATE OF SERVICE

SC PUBLIC SERVICE  
COMMISSION

2007 OCT 30 PM 1:24

RECEIVED

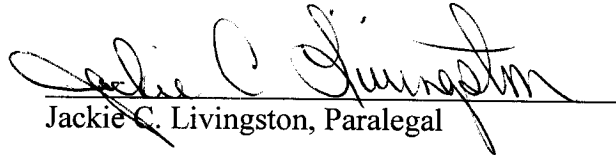
This is to certify that I, Jackie C. Livingston, the undersigned employee of Elliott & Elliott, P.A. have this October 30, 2007 served one (1) copy of the attached Petition to Intervene by United Telephone Company of the Carolinas d/b/a Embarq in the above-referenced matter to the persons named below by causing said copies to be deposited with the United States Postal Service, first class postage prepaid and affixed thereto, and addressed as shown below.

Beacham O. Brooker Jr., Esquire South Carolina Department of Transportation Post Office Box 191 Columbia, SC 29202-0191  (Representing South Carolina Department of Transportation)	Nanette S. Edwards, Esquire Office of Regulatory Staff Post Office Box 11263 Columbia, SC 29211  (Representing Office of Regulatory Staff)
Patrick W. Turner, Esquire BellSouth Telecommunications, Inc. d/b/a AT&T South Carolina Suite 5200 1600 Williams Street Columbia, SC 29201  (Representing AT&T South Carolina)	Margaret M. Fox, Esquire McNair Law Firm, P.A. Post Office Box 11390 Columbia, SC 29211  (Representing South Carolina Telephone Coalition)
Steven W. Hamm, Esquire C. Jo Anne Wessinger Hill, Esquire Richardson Plowden & Robinson, P.A.	Stan Bugner, State Director Verizon South, Inc. 1301 Gervais St. – Suite 825

1900 Barnwell Street P.O. Drawer 7788 Columbia, SC 29201  (Representing Verizon)	Columiba, SC 29201  (Verizon)
Dulaney L. O'Roark III Verizon 5055 North Point Parkway Alpharetta, GA 30022  (Verizon)	

Columbia, South Carolina

October 30, 2007

  
Jackie C. Livingston, Paralegal